

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

FLAWAWORKS ENTERTAINMENT, INC.,  
BLATINO MEDIA, INC.,

Plaintiffs,

vs.

**CASE NO.: 1-24-cv-09725**

Honorable Franklin U. Valderrama  
Magistrate: Honorable Appenteng

JOHN DOES, et al., including  
CHRISTOPHER LARINO and  
SHANE MICHAEL GORDON, et al,

Defendants.

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**MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING TO  
THE FOURTH AMENDED COMPLAINT**

Now comes the defendant, Mr. Shane Michael Gordon, by and through his attorney, Mr. Michael P. Simkus, ESQ., and requests that this honorable court grant him an enlargement of time of twenty-eight (28) days, up to and including September 5, 2025, to file an Answer or to otherwise plead to the Plaintiffs' Fourth Amended Complaint, and in support thereof states:

1. Mr. Gordon retained counsel, Mr. Michael P. Simkus, ESQ. on August 7, 2025.
2. Mr. Simkus has not yet had an opportunity to have an extensive meeting with his client, Mr. Gordon, to discuss Plaintiffs' Fourth Amended Complaint.
3. The responsive pleading on behalf of Mr. Gordon is due today, August 8, 2025.
4. Defense counsel wrote to Mr. Hameed Odunewu, plaintiffs' counsel, earlier today on August 8, 2025. Mr. Odunewu agreed to the requested enlargement of time. Mr. Simkus communicated to Mr. Odunewu that he would represent to the court that counsel for the parties are in agreement.
5. This motion for enlargement of time is not made for purposes of delay. Counsel

needs to meet and confer with his client, Mr. Gordon, who is a licensed attorney who lives and works in the State of Georgia, review and analyze the Plaintiffs' lawsuit, the pleadings filed in this lawsuit, as well as the allegations raised in the Fourth Amended Complaint.

**WHEREFORE**, counsel for Mr. Shane Michael Gordon requests that this Honorable Court enter an order that allows Mr. Gordon an enlargement of time, up to and including September 5, 2025, to answer or otherwise plead to the Plaintiffs' Fourth Amended Complaint, relief the court deems just.

Dated: August 8, 2025.

(s) Michael P. Simkus  
**FS CORPS, Professional Corporation**  
MICHAEL P. SIMKUS, ESQ.  
4320 WINFIELD ROAD SUITE 200  
WARRENVILLE, ILLINOIS 60555